

ALLIANCE AIR CUSTOMER DATA PRIVACY POLICY

Alliance Air is committed to respecting your privacy and protecting your Personal Information which Alliance Air collects, uses and discloses for regulatory and business purposes in order to provide the Customer with a safe, smooth, efficient and customized experience with Alliance Air. We will be transparent about the information we are collecting and what we will do with it. We will use the information you give us for the purposes described in our Privacy Policy, which include providing you with services you have requested and enhancing your experience with Alliance Air.

You should read this Policy carefully, by continuing to use our sites and/or our services or otherwise providing us with any information, you signify that you have read, understood and agree to be bound by this policy (the "Privacy Policy" and "Policy") as amended from time to time in respect of Alliance Air's collection, use, handling and disclosure of your information as described in this Policy.

You can access our full Privacy Policy below to help you understand better how we use your Personal Information. In it, we explain in more detail the types of Personal Information we collect, how we collect it, what we may use it for, and who we may share it with.

Please note that this Policy is not a contract and does not create any legal rights or obligations. Instead, this Policy serves as guidelines for protecting your information.

Within the Privacy Policy you will find some specific examples of why and how we use your Personal Information. If you have further questions please get in touch with us by writing to Data Protection Officer, Alliance Air.

Without prejudice to your rights under applicable laws, the above terms and the Privacy Policy herein are not contractual and do not form part of your contract with us.

For the purpose of this Policy, wherever the context so requires "you" or "your" shall mean Customer and the term "we", "us", "our" shall mean Alliance Air.

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CHAPTER - I

Introduction

Alliance Air Aviation Limited is a company incorporated under Companies Act 1956, having its registered address at Alliance Bhawan Domestic Terminal-1, IGI Airport New Delhi-110037 (Hereinafter referred to as “AAAL” or “Alliance Air”), AAAL is engaged in the business of operating, managing and providing scheduled air transport services that operate as a low cost regional carrier under the brand name “Alliance Air”.

AAAL operates approximately about 100(One Hundred) flights per day from around 48 (Forty-Eight) Airports in the Country connecting Tier I, II and III cities. It is a regional carrier in India playing major role in Govt. of India’s most preferred “Regional Connectivity Scheme (“RCS”) under “UDAN” besides serving Northeast and other states like Agatti and Diu. It has a fleet size of 18 (Eighteen) aircraft of ATR family series with plans of expanding the fleet size to 22-25 aircraft with expansion operations to other neighboring countries. For the purpose of the General Data Protection Regulation (“GDPR”), we are the data controller (the “Controller”).

The Customers of Alliance Air include Customers of different nationality and jurisdiction who avail/ book various services of Alliance Air on different online and offline platforms, namely, Alliance Air Website, mobile site, mobile applications, Customer contact centre, authorized agents and affiliates of Alliance Air. In the course of availing such services, the Customers of Alliance Air provide certain Personal Data/ Information to Alliance Air and the said data and information is collected and used by Alliance Air to provide safe, smooth and efficient services to the Customers; in which event Alliance Air is the Controller of the Personal Information and data provided by the Customers.

Further, in certain cases, part of Alliance Air services require Customers to voluntarily share their preferences and options to avail additional services that involve third party participation for provision of such additional services. In such cases, Alliance Air collects and processes the Personal Information and data of the Customers with the third parties who are affiliates of Alliance Air.

In both the above cases, Alliance Air acts as either the Controller or the processor of the Personal Information collected from the Customers depending upon the purpose for which the data is collected.

This Policy applies to the information/data that Alliance Air collects about you, which may include the following situations, but not limited to, the use of Alliance Air-managed: Websites, ticketing offices, Customer contact centre, authorized agents or other affiliates. This Policy does not apply to any site not owned and managed by Alliance Air. Please see those respective sites for their respective privacy policies.

CHAPTER - II

Scope and Interpretation of this Policy

1. **“Cookies”** means small bits of information that are stored on your computer by your web browser. Web beacons or ‘pixel tags’ are small strings of code placed on a web page or in an email message for the purpose of transferring information.
2. **“Customer”** means any person who purchases / intends to purchase/inquires about any product(s) and / or service(s) made available by Alliance Air through any of Alliance Air’s Customer interface channels, namely: Website, mobile site, mobile app, offline channels including call centers, ticketing and reservations offices, authorised agents, affiliates and code share airlines.
3. **“GDPR”** means the General Data Protection Regulation 2016/679 as amended time to time. It is a regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area. It also addresses the export of Personal Data outside the EU and EEA areas.
4. **“Personal Information”** and **“Personal Data”** means details which identify you or could be used to identify you, such as your name and contact details, your travel arrangements and purchase history. It may also include information about how you use our Websites.

Personal Data that we collect includes but is not limited to:

(i) Personal Information that can be used to identify an individual, such as name, gender, date of birth, nationality, passport or other personal identification numbers;

(ii) contact information, such as mailing address, phone number, email address;

(iii) payment information, such as credit or debit card information, including the name of cardholder, card number, card issuing bank, card issuing country, banking account details, billing address and expiry date;

(iv) travel information, such as ticket numbers, destinations, flight information, visa;

(v) information on your other purchases made through AAAL, such as tracking your purchases of chargeable seats, excess baggage, seat upgrades, or other service preferences etc. through the Website (as defined below), holiday packages and other linked travel arrangements;

(vi) your Customer preferences, such as dietary, seating, places that you would like to visit or other service preferences;

(vii) information about your interactions with our in-flight and ground staff, such as the details of any complaint cases, incidences of lost baggage, call details, and

other information relevant to assist our ground staff to service you;

(viii) health information, such as doctors' notes, medical certificates and letters and requests related to medical conditions relevant to travel arrangement including medical records and insurance details;

(ix) information we receive from you on official social media channels and Website/ mobile app;

(x) information we receive from flight bookings made via our online booking platform;

(xi) information we receive from other sources e.g. our official page on social media websites;

(xii) record of correspondence, information which you voluntarily disclose to us by e-mail or other means (including ID cards or identification disclosures in certain cases for categories such as students, armed forces, doctors and nurses, persons with reduced mobility), whether pursuant to a contract or otherwise; and

(xii) business contact information, such as the contact details of the employees of our vendors and corporate Customers, as well as the contact details collected by our divisions including the cargo division and engineering division. Device and technical information (from you when you use our Website or Mobile App) such as IP addresses or other unique identifiers, like mobile carrier, time zone setting, operating system, date and time of the enquiries put forth by you, browser language, etc. and information about your location and mobile device. The information may be used to provide you with location-based services such as search results and marketing content

5. **“Technical Data”** means and includes device and technical information Customer gives us when using our Website (“www.allianceair.in”) such as IP addresses or other unique identifiers, like mobile carrier, time zone setting, operating system, platform, etc.
6. **“Customer Data”** means two broad categories of Customer Data that AAAL collects, namely Personal Data and Technical Data as defined herein.
7. **“Statistical Data”** is arrived at by using Customer Data. This may include information such as: number of passengers. This data is processed and stored purely for analytical purposes and is entirely anonymous and will not be stored to your Customer record and will only be aggregated for statistical analysis so that we can better understand AAAL's Customer profile and improve AAAL's service offering.
8. **“Sensitive Personal Data”** means that certain categories of Customer Data, such as information about your race, ethnicity, religion or health, are considered special categories of information, or “Sensitive Personal Data” under the GDPR.

CHAPTER - III

1. When does this Policy apply?

This Privacy Policy applies to Personal Information about you that we collect, use and otherwise process regarding your relationship with us as a Customer or potential Customer, including when you travel with us or use our other services, use our Websites or mobile websites or mobile applications, contact our service agents or call centres or ticketing offices or authorized agents or other affiliates and book to use our services through third parties (such as travel agents and other airlines).

Where we reference that others are data controllers in the sections, you should consult their privacy policies for further information.

Additional terms and conditions or policies may apply if you elect to take additional services from us such as making a purchase on board, using our on-board Wi-Fi or entering a competition linked to AAAL and other third parties.

2. Why we collect Customer Data and what we collect?

Alliance Air does not buy or acquire your Personal Information and data. Alliance Air collects and maintains your Personal Information and data when you provide the same while booking or availing services on the online and offline platforms of Alliance Air and its affiliates. We collect information from you when you make travel arrangements, contact us, complete a survey, participate in a promotion, or otherwise interact with us. The type of information we collect about you depends on your particular interaction with us. The collection of the following types of Customer Data is mandatory to enable AAAL to fulfil our contract of carriage with you. These types of Customer Data are marked as mandatory on our booking form. If you do not provide this information, we will not be able to provide you with our services and/or products required.

- I. The mandatory information we directly collect about you to provide the services booked by you is as follows:
 - a) Name;
 - b) Contact information, namely, address, phone number and e-mail address;
 - c) Gender and date of birth;
 - d) Payment information (namely, debt or credit card information, card number, name of cardholder, billing address and expiry date);
 - e) Passport information and photograph (in case of international travel);
 - f) User and activity data from our sites and applications;

Additional information may be mandatory if you are flying to a specific country, or if you are flying on behalf of a business registered in a specific country, e.g. your gender, nationality, passport number, the country of issue of your passport, the name, GST registration number and address of the business you are flying on behalf of, and your business email address and phone number. These mandatory fields will have to be completed/provided when you make a booking.

- II. The other information we collect about you, when you voluntarily opt to provide the same while booking services with Alliance Air, includes:
- a) Government ID;
 - b) Corporate ID or promo code;
 - c) Images;
 - d) Travel information, preferences and special requests (namely, flight information, dietary, seating or other service preferences, upgrades, baggage requirements, lost luggage);
 - e) Purchase information (including both travel and non-travel purchases);
 - f) Health information (namely, medical records or requests);
 - g) Survey responses;
 - h) Tax identification number of promotion or survey winner, depending on the value of the price.
- III. The failure to supply the following types of Customer Data will result in (i) AAAL being unable to update you on our latest products and/or launches; and/or (ii) your inability to enter or participate in contests, promotions or redemption activities organized by AAAL:
- a) Contact Information e.g., email address, telephone number; and
 - b) Country of residence

3. Why do we collect Personal Information/Data about you?

The main purposes for which we use your Personal Information are:

- a) To fulfil your travel arrangements and deliver the services you have asked for.
- b) To manage the boarding process and to facilitate flight connections at the airport.
- c) To send status updates and service communications to you.
- d) To keep track of you in advance of your flight and at the airport.
- e) To help keep you safe when you fly with us and to meet certain legal and regulatory requirements which apply to AAAL as an airline.
- f) To provide services tailored to your requirements and to treat you in a more personal way.
- g) To carry out analysis and market research.
- h) To carry out marketing including online advertising and keep you informed of AAAL's products and services.
- i) To undertake targeted online advertising.
- j) To send you status updates and service communications.
- k) To improve our Websites, products and services.
- l) For management and administrative purposes.

4. When do we collect Personal Information about you?

We collect Personal Information about you whenever you use our services (whether these services are provided by us or by other companies or agents acting on our behalf), including when you travel with us, when you use our Website, or interact with us via email or use our contact centres or official social media channels.

In addition, we may receive Personal Information about you from third parties, such as:

- a) Companies contracted by us to provide services to you.
- b) Companies involved in your travel plans, including airlines involved in your prior or onward journey, relevant airport operators and customs and immigration authorities.
- c) Companies that participate in our loyalty schemes and other Customer Programmes (e.g. car hire providers and hotels).
- d) Companies who provide details to us under Privacy Policies, providing information to be shared with AAAL.

5. When and why do we collect 'Sensitive Personal Data'?

Certain categories of Personal Information, such as that about race, ethnicity, religion, health, sexuality or biometric information are special categories of data requiring additional protection as "Sensitive Personal Data". Generally, we try to limit the circumstances where we collect and process Sensitive Personal Data. Examples of where we may collect and process 'Sensitive Personal Data' includes the following:

You have requested specific medical assistance from us and/or an airport operator, such as the provision of wheelchair assistance or oxygen.

You have sought clearance from us to fly with a medical condition or because you are more than 36 (Thirty-Six) weeks pregnant.

You have otherwise chosen to provide such information to us, or it has been passed onto us by a third party such as the travel agent through which you made your booking.

You have made certain requests in connection with your travel arrangements that reveal or suggest something about you that could be considered sensitive personal data (for example certain meal requests that disclose your religion), or if you otherwise choose to provide such Personal Information to us (or a third party such as the travel agent through which you made your booking).

Biometric information (for example, facial recognition) may be collected during the security clearance process prior to, and after, flying with us.

In addition, you may have requested services (such as a meal) which is not 'sensitive data' but may imply or suggest your religion, health or other information.

AAAL does not use the personal information of its customers for racial or ethnic purpose, political opinions, religious or philosophical beliefs or trade union memberships, processing of genetic or biometric data for the purpose of uniquely identifying a natural person. However, this prohibition

does not apply where any particular customer has given his or her consent for one or more such purposes or where the processing of the customer information is necessary for purposes of carrying out legal obligations of AAAL, or where the personal data of any customer is manifestly public data.

6. What is the legal basis for AAAL to use your Personal Information?

AAAL will only process your Personal Information where we have a legal basis to do so. The legal basis will depend on the reason or reasons AAAL collected and needs to use your information. In almost all cases the legal basis will be:

- a) because we need to use your information so that we can process your booking, fulfil your travel arrangements and otherwise perform the contract we have with you;
- b) because it is in AAAL's legitimate interests as an airline to use your Personal Information to operate and improve our business as an airline and travel provider;
- c) because AAAL needs to use your Personal Information to comply with a legal obligation.
- d) to protect the vital interests of you or another person; and/or
- e) because you have consented to AAAL using your information for a particular purpose.

If processing of your data is subject to any other laws, then the basis of processing your data may be different to that set out above and may in those circumstances be based on your consent in all cases.

7. How long do we keep Personal Information?

- a) We will keep your information for as long as we need it for the purpose it is being processed for. For example, where you book a flight with us, we will keep the information related to your booking, so we can fulfil the specific travel arrangements you have made and after that, we will keep the information for a period which enables us to handle or respond to any complaints, queries or concerns relating to the booking. The information may also be retained so that we can continue to improve your experience with us and to ensure that you receive any loyalty rewards which are due to you.
- b) We will actively review the information we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal, business or Customer need for it to be retained. If you stop interacting with us as a Customer, we will remove or anonymise your information after 7 (Seven) years.

8. Who do we share your Personal Information with?

Your Personal Information including sensitive personal data may be shared with the companies within our group. For more details about our group, please visit our website www.allianceair.in. We share information with them, so they can assist us in providing services to you and to understand more about you. For example, if you have

flown with one of the other airlines in our group, we may use this information to understand more about the sorts of travel services you are likely to be interested in.

You will only be sent marketing emails from other companies within our group, where you have provided your consent to those companies.

We may also disclose your Personal Information to the following third parties for the purpose described here:

- a) To allow customs and immigration authorities of any country in your itinerary or to which your flight may fly over. AAAL and other airlines are required by laws in other countries to give border control agencies and customs authorities access to booking and travel information when you fly to and from countries including stop-overs and where you may overfly countries to your destination;
- b) To provide government access to AAAL booking records where so required by applicable laws and regulations and to facilitate smooth flight operations;
- c) To provide information about passports, visas and API (Advanced Passenger Information) where so required by applicable laws and regulations and to facilitate smooth flight operations;
- d) Airlines and other service providers needed to deliver the services you have asked for where, for instance, part of your travel itinerary involves a flight operated by a different airline or includes car hire or a hotel booking. Those airlines and other service providers will be identified when you make a booking;
- e) If you have joined: our Programs or another affiliated loyalty Program, our partners in the loyalty schemes, so that we can administer the benefits of the loyalty Program to you;
- f) To enable credit card companies, credit reference agencies and anti-fraud screening service providers to process payments and (where necessary) to carry out fraud-screening;
- g) In order to respond to a valid, legal request from government and law enforcement agencies such as customs and immigration authorities;
- h) In order to coordinate with our third-party service providers that we are using to provide services that involve data processing, for example, to carry out marketing initiatives or run Customer surveys on our behalf.;
- i) In order to coordinate with our third parties, such as law firms and law courts, to enforce or apply any contract with you;
- j) To provide third parties, such as the police and regulatory authorities, to protect our rights, property, or the safety of our Customers, staff and assets;

- k) To provide usage information (but not your Personal Data) to other websites so that they know that you have visited our Websites;
- l) We may provide usage information including your Personal Data to marketing agencies to deliver online advertising on websites or social networks, we may from time to time appoint, authorise or contract with strategic business partners and share your Personal Information or disclose other information to these business partners (including affiliates of AAAL), authorised or contracted third parties, service providers or advertisers for marketing or cross-marketing purposes and to make available to you promotions, offers, and other products or services, which may or may not belong to us. ;
- m) If necessary, to comply with any legal or regulatory obligation in any jurisdiction, including where that obligation arises because of a voluntary act or decision by us (e.g. our decision to operate to a country or a related decision);
- n) If you are booking a package of a flight and/or other services (such as hotels) with AAAL (or they are providing parts of your package) as set out in AAAL terms and conditions, your Personal Information is provided to both AAAL and the concerned party/parties.
- o) AAAL's travel and freight service providers or travel-related businesses and service providers (including ground personnel and security personnel, airport management, airport operators).
- p) Selected third parties (within or outside the country where the Personal Information was collected) including data analytics, advertisers and marketing agencies, travel-related businesses (such as our application programming interface (API) partners), partner airlines (interline, code share and strategic partners), safety and security personnel, parties which have business or contractual dealings with AAAL and its subsidiaries or affiliates, and any other third party, who is able to demonstrate that you have explicitly consented to the disclosure of your Personal Information by us to such third party.

It is to be noted that we do not sell Personal Information to third parties, and we only allow third parties to send you marketing information where we have your consent to do so.

Your Personal Information may also be disclosed or transferred to any of AAAL's actual or potential assignees, transferees or acquirers (including our affiliates and subsidiaries), or in connection with any corporate restructuring or exercise including any restructuring to transfer the business, assets and/or liabilities. In the event we go through a business transition, such as sale of part or all of our assets, merger or acquisition, your Personal Information will likely be disclosed or transferred. In the circumstances set out in this Privacy Statement where AAAL transfers your Personal Information to another entity, we will ensure that the security measures that such party has in place in relation to the processing of your data are at least as stringent as those employed by AAAL if not better, and that such transfers are only to the extent necessary for providing our services to you. This does not apply where we are required by law to pass your Personal Information to a third party.

9. What countries will your Personal Information be sent to?

Your Personal Information may be sent to and be stored by us and third parties in countries outside the country in which you are located.

The nature of our business means it is often necessary for us to send your Personal Information outside the country in which you are located to fulfil your travel arrangements. This occurs because our business and the third parties identified in 'Who do we share your Personal Information with?' have operations in countries across the world. For example, where you are flying outside the country where you are located, your Personal Information will be transferred to border control and immigration outside of these territories.

In addition, we may transfer your data to parties in countries outside the country in which you are located to provide services to us. This may involve sending your data to countries where under their local laws you may have fewer legal rights.

Where your Personal Information is transferred outside the country in which you are located, it may be because we are using a service provider in a third country. However, we will implement safeguards so that your Personal Information continues to be protected to the standards set out in this Privacy Policy.

If you would like more information on these safeguards, please contact the Data Protection Officer, email-id: DPO.AAAL@allianceair.in

10. When will we send you marketing?

We do sometimes send marketing communications that include a business partners' products and services related to the travel you are undertaking, as well as our own. When we have your permission, we will send you marketing communications from AAAL.

We will only allow third parties or other members of our group to send marketing communications to you when we have agreed marketing from third parties. We will respect your choice as to what communications you wish to receive and how these are sent.

11. How can you change what marketing communications you receive, how you receive them and how to unsubscribe such communications?

If you decide you would no longer like to be sent marketing communications, you can change your mind at any time. The ways to stop being sent marketing communications are described below:

- a) If you are a member of our Programs, you can change your marketing preferences at any time in your account area or by telephone (calls charged at local rate), or writing to us at Helpdesk@allianceair.in. If you're based in another country, please see the specific Program' contacts for your local service centre.
- b) If you are a registered user of AAAL Website, you can change your marketing preferences at any time in your account area.

- c) If you are a member of our Programs, we will continue to keep you informed about your membership and other important service information relating to the Program. If you ask us to stop sending marketing communications, please note we will retain your Personal Information for the sole purpose of indication that you do not want to receive future marketing communications.

12. What are your legal rights in relation to the Personal Information we hold about you?

Our responses to exercise of your rights will be provided within 1 (One) month and generally there is no fee for making these requests. If your request is particularly complicated, we may extend the deadline for responding to 3 (Three) months, but we will inform you if that is the case.

We will handle all requests in accordance with applicable law. However, depending on the right you wish to exercise, and the nature of the Personal Information involved, there may be legal reasons why we cannot grant your request. Further explanation of rights and the exceptions to them are set out below.

Your rights include the following:

- a) You may request us to stop sending you marketing communication. If you do so, we will no longer be able to send you marketing communications. However, if you subsequently book a flight with us, we will need to send you communications about the services you have booked to use, such as your travel. It is important to note that these communications will help you get the most from the services that we provide and may also contain options and other details about the services you will be using (e.g. advance seating requests, additional baggage and pre-booked meals).
- b) You may request us to stop using your Personal Information where we are doing so under legitimate interests unless, it is needed for dealing with legal claims or we have other compelling legitimate reasons that override your rights.
- c) You may also request us to stop processing of your Personal Information for marketing purposes including analytics for the purposes of targeted marketing, including online advertising.
- d) You may access the Personal Information we hold on you. There are some limited exceptions to this right, such as information relating to others who have not consented to the disclosure of their information and information which is legally privileged.
- e) You may ask us to correct the Personal Information that you have shared with us (the 'right of rectification') if that information is inaccurate. You may be able to update much of it yourself through your www.allianceair.in account area, including personal and contact details. If you spot any inaccuracies in the report that you cannot fix yourself, please email the details to helpdesk@allianceair.in. We are not able to amend any data that has been created as a result of a transaction with us e.g., flight history.
- f) You may ask for Personal Information which identifies you to be removed (anonymized). To do this the information that identifies you will be removed from our active systems. However, a separate and restricted copy of the identifying information will be kept for 7 (Seven) years to meet the obligations we have towards law enforcement, national authorities and legal proceedings.

Please note certain considerations for removing/anonymizing data:

- a) We may need to retain certain elements that relate to a contract between you and AAAL because we need it for our own legal and auditing purposes.
- b) A record of your request including the Personal Information you supplied will be retained in the application used to carry this out for 3 (Three) years.
- c) In some circumstances, it may mean we will not be able to provide all or parts of the services you have requested from us in relation to previous travel or retain any preferences you have previously shared with us.
- d) If you are a member of our Programs, we will close the account, if so requested.
- e) We will be unable to anonymize your information if you are an authorizer of an on- business account as we would require this information to deliver our contract with you. If you wish to proceed, you will need to transfer your on-business authorization beforehand.
- f) We cannot erase your Personal Information if you have either flown with us in the past 13 (Thirteen) months or you hold a forward booking with us and for those legal reasons, we need to keep information linked to these flights. You may come back to us once this time period has passed and submit a request for erasure.
- g) We cannot erase your Personal Information if we have identified that, you either have an open complaint with us, or we hold a previous case of yours within the past 7 (Seven) years. We are required to retain this information in case there is a need to re-open the complaint.

In exceptional circumstances, AAAL reserves the right to deny you access to your personal information and may provide an explanation as required by applicable laws. Exceptional circumstances include where:

- An investigating authority or government institution objects to AAAL complying with a customer's request,
- The information may, in the exercise of AAAL's reasonable discretion and/or assessment, affect the life or security of an individual, and
- Data is collected in connection with an investigation of a breach of contract, suspicion of fraudulent activities or contravention of law.

13. How can you exercise your legal rights and change how we use your data?

If you wish to change how we use your Personal Information, please use our Email ID. We will ask for some information to identify you, which will only be used to process your request. We will verify your identity via email before continuing with your request.

Alternatively, you can make a request by writing to us, ensuring you mark the letter for Customer Permissions as mentioned below:

Customer Permissions

Data Protection Office
DPO.AAAL@allianceair.in

Accessing your Personal Information

If you wish to review the Personal Data, we hold on you and your flight history, please use our Email id

If you wish to receive a copy of any other information, we hold on you, we recommend that you make a request in writing and include the following information with your request:

- a) your name and postal address
- b) details of your request
- c) we would need corroborating information to establish your identity this could be: a photocopy of your passport or driving license etc.
- d) your signature and the date of the request
- e) if you are applying on behalf of another person then, signed authority from such individual is required

Any details which may help us locate the information which is the subject of your request, for example:

- a) Booking reference or flight numbers and dates
- b) Program membership number
- c) Telephone recording details (identifier number, the number you call from, the number and option you dialed, the date and time of your call(s)).

The address for a written request is:

Alliance Air Aviation Limited

Alliance Bhawan, Domestic Terminal-1, I.G.I.

Airport, New Delhi-110037

Data Protection Officer

DPO.AAAL@allianceair.in

To protect your privacy and Alliance Air's proprietary databases and systems, you should not share any of your information, or password, with any unauthorized individuals or third-party information aggregators that would allow them access to your Sensitive Personal Data. You should also take all necessary steps to secure your mobile devices and protect information you may have stored on them as we do not have control over the security of your mobile device. Alliance Air assumes no responsibility for the loss of information associated with security disrupting technologies, including but not limited to, reverse engineering of mobile device applications or malware, that compromise the Alliance Air mobile application(s) as a result of owner or third-party initiated changes to the mobile device. The security of that mobile device is the responsibility of its owner and not Alliance Air.

14. What are the various sources of our information collection?

We collect your information from both online and offline sources (**Information we collect through our mobile application(s) (through cookies, beacons or other tracking technologies designed for mobile applications)**) as mentioned:

- a) **Online purchases:** When you book, purchase or enquire for services at Alliance Air-managed Websites, mobile sites and mobile applications.
- b) **Offline purchases:** When you book, purchase or enquire for Alliance Air services at Alliance Air ticketing offices, Customer contact centres or through authorized agents or other affiliates of Alliance Air.

To make a purchase or transact other business with Alliance Air Customer contact centre, travel agents (including online travel agents outside of Alliance Air), or a Customer service representative (collectively, "**Reservations Agents**"), Reservations Agents collect data, namely, payment information, birth date, name, addresses, email addresses, and telephone numbers. We may monitor and/or record telephone calls to Reservations Agents. By continuing with the call, you are deemed to consent to such monitoring and/or recording. It may be noted that the Reservation Agents are not directly under the control of Alliance Air until you book Alliance Air services with them.

- c) **Medical or other emergency:** If a medical or other emergency occurs while travelling with Alliance Air, we may collect information, including but not limited to, first and last name, contact information, date of birth, medical history or information, and may share such information with third-party medical or other safety personnel as necessary or advisable.
- d) **Third-party analytics:** We also use automated devices and applications, such as Google Analytics etc., to evaluate the use of our Websites and apps and the services we provide. We use these tools to gather information about you to help us improve our services, performance and user experiences. These analytics providers may use Cookies and other technologies to perform their services and may combine the information that they collect about you on our Websites with other information that they have collected. This Policy does not cover such third parties use of the data.

CHAPTER - IV

How we use Customer Data?

We primarily use the information collected from you, to carry out our business operations and provide our services to you, fulfil necessary compliances under applicable law, facilitate your specific requests and preferences, gather feedback from you to improve our services and build continued relationship with you and to provide you value added offers and other allied options to avail our services.

If you are an EU resident, we are required to disclose the legal basis for processing your data under the GDPR. We will use the Customer Data in the following ways:

In accordance with our contract of carriage with you, we will use the Customer Data to:

- a) process and assist you with any transactions related to your booking (e.g., making a booking, providing services related to the booking (e.g., seat selection, accommodation, etc.), fulfilling such booking and investigating potential fraudulent transactions);
- b) notify you about changes to our services, including through flight alert messages via AAAL's mobile services facility;
- c) facilitate airport, internet check-in and self check-in;
- d) provide airport services such as processing information relating to connecting flights, arrangements at airports and customs and immigration facilities;
- e) provide baggage related services such as processing of any baggage related queries, including mishandled or missing baggage claims;
- f) provide in-flight catering and other services (e.g., to provide you with a personalised inflight experience);
- g) in accordance with our contract with you as a Program member, we will use the Customer Data to maintain your Program account; facilitate membership-related transactions and services so as to enable the member to log in using the specific Program account on any of the platforms hosted by AAAL and send you membership status updates and other account related information.

As it is in our legitimate interests to be responsive to you, to provide customised services and marketing and to ensure the proper functioning of our products, services and organization, we will use your Customer Data to:

- a) improve the Website and to ensure content from the Website is presented in the most effective manner for you and your device;
- b) administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- c) monitor and record calls for quality, training, legal compliance, analysis and other related purposes in order to pursue our legitimate interest to improve service delivery;
- d) send you surveys by post or email (including surveys related to the specific Program in which you enroll yourself as a member. You can opt-out of receiving these surveys at any time by contacting us;

- e) send you service emails, such as reminders when you have not checked out your purchases on our Website. You can opt-out of receiving service emails at any time by contacting us;
- f) respond to your enquiries, requests or feedback;
- g) enforce our terms, conditions and policies;
- h) allow you to participate in interactive features of the Website, when you choose to do so;
- i) customize our products and services to you, including by responding to and catering for your Customer preferences;
- j) personalize the content you see on our Website, by enabling you to save your preferences and suggesting content for your next flight;
- k) keep the Website safe and secure;
- l) aggregate Customer Data into anonymized Statistical Data (such as number of passengers flown on a particular journey), which we will use for statistical analysis so that we can better understand AAAL's Customer profile and improve AAAL's service offering;
- m) to customise our marketing e.g., send you targeted marketing on places you would like to visit, based on your responses to optional questions on our website and your prior travels. If you are an EU resident, you can object to this profiling and opt-out of receiving such targeting marketing; and
- n) In relation to the Programs:
 - i. market and communicate to the members information on AAAL promotions, contests, events and lucky draws, including those conducted by AAAL partners (with your consent where required by applicable laws);
 - ii. contact AAAL members regarding product and Customer related surveys and market research;
 - iii. respond to email and call enquiries from AAAL members;
 - iv. provide services to celebrate special occasions; and
 - v. send AAAL members news and e-statements and associated promotions and offers (with your consent where required by applicable laws).
- o) if you are an employee of an entity with a contractual relationship with us:
 - i. to contact you to perform our services, and in particular, to monitor and record calls for quality, training, legal compliance, analysis and other related purposes in order to pursue our legitimate interest to improve service delivery;
 - ii. enforce our terms and conditions against your employer; and
 - iii. communicate with you about products, services, promotions, events and other news and information we think will be of interest to you.

If you are an EU resident, you can object to this profiling and opt-out of receiving such targeted marketing.

With your consent where required by applicable laws, we will use your Customer Data to:

- a) send you marketing and promotional materials in relation to products and services offered by AAAL, AAAL's partner airlines and service partners, as well as AAAL's appointed agents including in relation to the Programs; and
- b) register you for Program membership.

You have the right to withdraw your consent at any time by contacting us at DPO.AAAL@allianceair.in

CHAPTER-V

Disclosure of Customer Data to other parties

- I. AAAL will share your Customer Data with selected third parties in the situations set out below:
 - a) our travel and freight service providers or travel-related businesses and service providers (including ground personnel and security personnel, partner airlines, airport management, airport operators;
 - b) our interline, code share and strategic alliance partners so that they can fulfil their contract of carriage for the flights you booked through AAAL and, where applicable, provide you with the relevant benefits of their frequent flyer programme. Where Customer Data is shared with such partners, the Customer Data will be used by that partner in accordance with their respective Privacy Policy;
 - c) advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
 - d) analytics and search engine providers that assist us in the improvement and optimisation of the Website.

- II. AAAL will share the Customer Data with its stations in order to better customise your preferences when you travel with AAAL:
 - a) For the purposes of our contract of carriage with you, i.e., to:
 - i. Fulfill bookings and facilitate flight transfers of passengers;
 - ii. Manage passengers who travel on flights operated by our interline, code share and strategic alliance partners and/or are Alliance Air members;
 - iii. Manage passengers during flight disruptions and provide necessary assistance and services;
 - b) As it is in our legitimate interests to be responsive to you, to provide customised services and marketing, to:
 - i. Respond to complaints or compliments received by AAAL from passengers who are sharing their flight experience on our flights

- ii. Providing an enhanced Customer experience and personalising offers to passengers
 - iii. Anticipating the servicing needs of passengers on flights with us;
 - iv. Understanding Customers better through analytics and research (including marketing research) to support personalization;
 - v. Contacting Customers about Alliance Air related updates, surveys and offers; and
- c) For the purposes of undertaking targeted direct marketing and other forms of marketing or advertisement, provided we have the consent of the recipient and/or have provided the opportunity to opt-out, in each case where required by applicable law
- III. AAAL will also use and disclose your Customer Data to persons who have been validly identified as being you or your authorized representative(s) pursuant to our then-current security procedures, for the purpose of the relevant transaction or enquiry. In particular, each of the passengers who are grouped under the same Passenger Name Record (“PNR”) number shall be deemed to be authorized representatives of each of the other passengers under the same PNR number.
- IV. AAAL will disclose your Customer Data to law enforcement agencies, public, regulatory authorities, border control agencies or other organizations for security, customs and immigration purposes, if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to
- a) comply with legal obligation, process or request;
 - b) enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
 - c) detect, prevent or otherwise address security, fraud or technical issues; or
 - d) protect the rights, property, health or safety of us, our users, a third party or the public as required or permitted by law (including exchanging Customer Data with other companies and organizations for the purposes of fraud protection and credit risk reduction).
- V. We will also disclose your Customer Data to third parties
- a) in the event that we sell or buy any business or assets, in which case we may disclose your data to the prospective seller or buyer of such business or assets;
 - b) if we or substantially all of our assets are acquired by a third party, in which case Customer Data held by us about our Customers may be shared with such companies; or
 - c) to comply with legal obligations, processes or requests (such as disclosing Customer Data to executors in response to court orders).

In addition, AAAL may disclose Customer Data to our legal advisors for establishing, exercising or defending our legal rights, to our other professional advisors, or as otherwise authorised or required by law. AAAL also reserves the right to share Customer Data as is necessary to prevent a threat to the life, health or security of an individual or corporate entities such as AAAL. Further, AAAL will disclose Customer Data, as is necessary, to investigate suspected unlawful activities including but not limited to fraud, intellectual property infringement or privacy.

CHAPTER-VI

EU Data Subject Rights

If you are a resident in the EU, you may have certain rights in relation to the Customer Data we hold about you, which we detail below. Some of these only apply in certain circumstances where AAAL is holding authority of the data and legally/contractually allowed as per the local laws as set out in more detail below. We also set out how to exercise those rights.

These rights include:

- a) The right of access.
- b) The right of data portability.
- c) The right of rectification.
- d) The right of erasure.
- e) The right to restrict processing.
- f) The right to object.

Please note that we will require you to provide us with proof of identity and address before responding to any requests to exercise your rights. We must respond to a request by you to exercise those rights without undue delay and at least within 1 (One) month (although this may be extended by a further 3 (Three) months in certain circumstances). To exercise any of your rights, please contact us at DPO.AAAL@allianceair.in

I. Complaints

In the event that you wish to make a complaint about how we process your Customer Data, please contact us and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with your data protection authority.

II. Access

You have the right to know whether we process Customer Data about you, and if we do, to access Customer Data we hold about you and certain information about how we use it and who we share it with. If you require more than 1 (One) copy of the Customer Data, we hold about you, we may charge an administration fee. We may not provide you with certain Customer Data if providing it would interfere with another's rights (e.g. where providing the Customer Data we hold about you would reveal information about another person) or where another exemption applies.

III. Portability

You have the right to receive a subset of the Customer Data we collect from you in a structured, commonly used and machine-readable format and a right to request that we transfer such Customer Data to another party. The relevant subset of Customer Data is

data that you provide us with your consent or for the purposes of performing our contract of carriage with you. If you wish for us to transfer the Customer Data to another party, please ensure that you provide details of such other party and also note that we can only do so where it is legally, contractually and technically feasible to do so. We are not responsible for the security of the Customer Data, its transmission or its processing once received by the third party. We also may not provide you with certain Customer Data if providing it would interfere with another's rights (e.g. where providing the Customer Data we hold about you would reveal information about another person).

IV. Correction

You have the right to correct any Customer Data held about you that is inaccurate. AASL reserves the right to charge a reasonable administrative fee for this service. Please note that whilst we assess whether the Customer Data, we hold about you is inaccurate or incomplete, you may exercise your right to restrict our processing of the applicable data as described below.

To exercise any of your rights, please contact us at helpdesk@allianceair.in

V. Erasure

You may request that we erase the Customer Data we hold about you in the following circumstances, if:

- a) you believe that it is no longer necessary for us to hold the Customer Data we hold about you;
- b) we are processing the Customer Data we hold about you on the basis of your consent and you wish to withdraw your consent and there is no other ground under which we can process the Customer Data;
- c) we are processing the Customer Data we hold about you on the basis of our legitimate interest and you object to such processing. Please provide us with detail as to your reasoning so that we can assess whether there is an overriding interest for us to retain such Customer Data;
- d) you no longer wish us to use the Customer Data we hold about you in order to send you promotions, special offers, marketing and lucky draws; or
- e) you believe the Customer Data we hold about you is being unlawfully processed by us, in which case, please contact us at the earliest possible in order for us to take swift action.

Also note that you may exercise your right to restrict our processing of the Customer Data whilst we consider your request as described below.

Please provide as much detail as possible on your reasons for the request to assist us in determining whether you have a valid basis for erasure. However, we may retain the Customer Data if there are valid grounds under law for us to do so (e.g., for the defence of legal claims or freedom of expression) but, we will let you know if that is the case. Please

note that after deleting the Customer Data, we may not be able to provide the same level of servicing to you as we will not be aware of your preferences.

Where you have requested that we erase Customer Data that we have made public and there are grounds for erasure, we will use reasonable steps try to inform others that are displaying the Customer Data or providing links to the Customer Data to get erased the Customer Data from their systems. However, AASL takes no responsibility or guarantee of erasure by third parties.

To exercise any of your rights, please contact us at helpdesk@allianceair.in.

VI. Restriction of Processing to Storage Only

You have a right to require us to stop processing the Customer Data we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the Customer Data, we may use it again if there are valid grounds under data protection law for us to do so (e.g. for the defence of legal claims or for another person's protection).

You may request we stop processing and just store the Customer Data we hold about you where:

- a) you believe the Customer Data is not accurate, for the period it takes for us to verify whether the Customer Data is accurate;
- b) we wish to erase the Customer Data as the processing we are doing is unlawful, but you want us to just store it instead;
- c) we wish to erase the Customer Data as it is no longer necessary for our purposes, but you require it to be stored for the establishment, exercise or defense of legal claims; or
- d) you have objected to us processing Customer Data we hold about you on the basis of our legitimate interest and you wish us to stop processing the Customer Data whilst we determine whether there is an overriding interest in us retaining such Customer Data.

VII. Objection

At any time, you have the right to object to our processing of Customer Data about you in order to send you promotions, special offers, marketing messages, including where we build profiles for such purposes and we will stop processing the Customer Data for that purpose.

You also have the right to object to our processing of Customer Data about you and we will consider your request in other circumstances as detailed below by contacting helpdesk@allianceair.in referencing: Data Subject Rights.

You may object where we are processing the Customer Data we hold about you (including where the processing is profiling) on the basis of our legitimate interest and you object to such processing.

Please provide us with details as to your reasoning, so that we can assess whether there is a compelling overriding interest in us continuing to process such data or we need to

process it in relation to legal claims. Also note that, you may exercise your right to request that, we stop processing the Customer Data whilst we make the assessment on an overriding interest.

CHAPTER - VII

Use of Cookies, web beacons and other similar technologies

- a) Alliance Air and our third-party service providers collect information by using technologies and methodologies, such as "Cookies", tags, web beacons or other similar technologies that enable tracking as you browse our sites. We use these technologies to authenticate you as a user, to remember your preferences for using the site, to present offers that may be of interest and to facilitate transactions, such as flight searches and purchases. We and our third-party service providers also use these tools to analyze use of our sites and our services. We may use this information in the aggregate or combine it with information that we have already collected about you.

Cookies and the other technologies discussed in this section allow us to recognize your preference information, to track your transactions, to provide enhanced functionality and to facilitate effective website administration.

Cookies help establish a user session and allow our server to provide site users with the appropriate information, advertisements and services. We also use Cookies to ensure you obtain the information you request, to authenticate your authority to access the site and to track the usage of our websites in order to improve the site(s) according to our Customers' needs. If you do not want your information to be collected through Cookies, you can change the preferences in your particular internet browser. Some website functionality may not work properly if your browser does not accept Cookies. Please consult your chosen internet browser for instructions on how to change your Cookie settings.

- b) **"Other Technologies"**: These technologies allow us to recognize your preference information, keep track of your transactions and facilitate effective website administration. We and our third-party service providers may use other technologies (also known as web beacons, web bugs or pixel tags), in connection with our sites and services to, among other things, track the activities of visitors, help us manage content and compile statistics about usage. We and our third-party service providers may also use emails sent to you to help us track email response rates, identify when our emails are viewed and track whether our emails are forwarded. If mobile App is there, the relevant information collected from mobile app may be added For example, Your pinpointed physical location information from technologies like GPS, Wi-Fi, or cell tower proximity (geo-location tracking), if you agree to grant us permission to do so, At select airports, your precise location may be tracked continuously to provide you with location-based services, if you agree to grant us permission to do so, Your domain name, Device ID or alternative ID where required by the platform provider, Electronic data concerning operating systems and computing devices/browser, including types, Features you use and links you click, Amount of time spent in the application, Installs and uninstalls and/or Transaction details and history

CHAPTER - VIII

Minors

Due to the nature of our services, Alliance Air will collect and maintain travel information, about minor (i.e., below the age of majority according to applicable laws) when necessary to comply with security regulations, for safety reasons, or as otherwise necessary for Alliance Air to provide transportation or other services requested.

Alliance Air cannot distinguish the age of persons who access and use its Websites. If a minor (according to applicable laws) has provided Alliance Air with Customer Data without parental or guardian consent, the parent or guardian should contact Alliance Air to remove the relevant Customer Data and unsubscribe the minor.

CHAPTER - IX

Disclaimer

1. In no event shall Alliance Air be liable for any direct, indirect, special, punitive, exemplary or consequential losses or damages of whatsoever kind arising out of access to, or the use of any information voluntarily provided by the Customer for availing Alliance Air services.

2. Alliance Air also accepts no liability for violation of data protection rights of any Customer if the information provided by such Customer is handled, used, stored or disclosed by Alliance Air in accordance with this Policy or as mandated by applicable laws and regulations.

CHAPTER - X

Miscellaneous

a) Location of your information / Data transfer

Alliance Air will transfer, store, and process information that we collect about you, as described in this Policy, in India, which may not provide the same level of protection for your Personal Information as your home country. In addition, we may further transfer your information outside India for the purposes described in this Policy. By submitting any Personal Information or by using the Website and without limitation to any other rights or obligations we have, you consent to such transfer to, and processing in, India and these other countries, and acknowledge that your information may be subject to access by law enforcement and other government entities, including courts and tribunals, in accordance with laws applicable in those jurisdictions.

b) Retention

Alliance Air will retain your information for as long as it is necessary to fulfill the purpose legal or business purposes of Alliance Air for which it was collected, or as required by relevant laws and in case of Personal Information, as mentioned above. When destroying your information, we will take commercially reasonable and technically possible

measures to make the Personal Information irrecoverable or irreproducible in accordance with the applicable laws.

c) Accuracy

AAAL needs your assistance to ensure that your Customer Data is current, complete and accurate. As such, please inform AAAL of changes to your Customer Data by contacting AAAL and submitting your updated particulars to AAAL in writing. AAAL reserves the right to charge a reasonable administrative fee for this service.

AAAL will also request Customer Data updates from you from time to time. As detailed above, your booking information or flight itinerary will be disclosed to the appropriate customs and immigration authorities as required by law. As such, it is important to ensure that the Customer Data contained in your booking information or flight itinerary is current, complete and accurate.

d) Links to other sites/digital channels

Our sites and our online services may contain links to third party sites. Any access to and use of such linked sites is not governed by this Policy but instead is governed by the privacy policies of those third-party sites. Please note that we are not responsible for the information practices of such third-party sites.

e) Security safeguards

AAAL takes the protection of your Customer Data seriously but, unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Customer Data, we cannot guarantee the security of your Customer Data transmitted through any channel, such as the website; therefore, any transmission is at your own risk.

f) Contact us

If you have comments or questions about this Policy, please submit your inquiry to Alliance Air to the respective departments.

If you have comments, questions or complaints about or requests relating to this Privacy Policy statement, please contact AAAL in writing at the address below referencing 'Privacy Policy':

Customer Relations

Alliance Air Aviation Limited

Alliance Bhawan, Domestic Terminal-1, I.G.I.

Airport, New Delhi-110037

E-mail: helpdesk@allianceair.in

**For specific queries relating to data protection at AAAL, please contact:
DPO**

Alliance Air Aviation Limited

Alliance Bhawan, Domestic Terminal-1, I.G.I.

Airport, New Delhi-110037

E-mail: DPO.AAAL@allianceair.in

g) Legal effect and changes to the policy

As previously stated, this Policy is not a contract nor does it otherwise create any legal rights or obligations. Rather, this Policy merely reflects guidelines setting forth Alliance Air's intended business practices. By using any Alliance Air digital channel, and/or by providing any information to Alliance Air online or offline, you consent to the collection and use of such information by Alliance Air, its affiliates, partners, contractors and permitted agents as herein described and consistent with applicable laws.

Also, Alliance Air, in its discretion, may amend, interpret, modify or withdraw any portion of this Policy and related business practices at any time by posting updated versions or texts on this site, and your continued use of our digital channels or offline outlets constitutes your consent to those changes.

A version of this Privacy Policy has been effective since 07-12-2021 This Privacy Policy supersedes previous privacy policies posted on Alliance Air website. Subject to applicable laws, the English version of this Policy will prevail over any version of this Policy in another language. In the event of any inconsistency in interpretation between the English version and any translation of the Privacy Policy, this Policy statement in English will prevail.

Thank you for taking out the time to read this Policy.