

# AIR INDIA CUSTOMER DATA PRIVACY POLICY

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## **CHAPTER - I**

### **Introduction**

Air India is a national carrier airline of India that operates its flights on domestic and international sectors.

The customers of Air India include customers of different nationality and jurisdiction who avail/ book various services of Air India on different online and offline platforms, namely, Air India website, mobile site, mobile applications, customer contact centre, authorised agents and affiliates of Air India. In the course of availing such services, the customers of Air India provide certain personal data and information to Air India and the said data and information is collected and used by Air India to provide safe, smooth and efficient services to the customers; in which event Air India is the controller of the personal information and data provided by the customers.

Further, in certain cases, part of Air India services require the 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, Air India collects and processes the personal information and data of the customers with the third parties who are affiliates of Air India.

In both the above cases, Air India acts as either the controller or the processor of the personal information and data collected from the customers depending upon the purpose for which the data is collected.

Air India is committed to respect the customer privacy and strives to take reasonable measures to protect customer information which Air India collects, uses and discloses for regulatory and business purposes and in order to provide the customer with a safe, smooth, efficient and customised experience with Air India.

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 as amended from time to time in respect of Air India's collection, use, handling and disclosure of your information as described in this Policy.

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.

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 Air India.

## **CHAPTER - II**

### **Scope and Interpretation of this Policy**

1. **“Customer”** means any person who purchase / intends to purchase / inquire about any product(s) and / or service(s) made available by Air India through any of Air India's customer interface channels, namely, website, mobile site, mobile app, offline channels including call centres, ticketing and reservations offices, authorised agents, affiliates and code share airlines.

2. This Policy applies to the information that Air India collects about you, which include the following situations:
  - On Air India-managed websites and mobile websites, namely, [airindia.in](http://airindia.in), [flyingreturns.co.in](http://flyingreturns.co.in), [flyai.mobi](http://flyai.mobi);
  - Through Air India-managed mobile applications, namely, Air India Mobile App;
  - Offline, namely, Air India ticketing offices, Customer Contact Centre, authorised agents or other affiliates.
3. This Policy does not apply to any site not owned and managed by Air India. Please see those respective sites for the privacy policies that may apply.

### **CHAPTER - III**

#### **Information we collect about you**

1. Air India does not buy or acquire your personal information and data. Air India 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 Air India and its affiliates. We collect information from you when you make travel arrangements, contact us, complete a survey, register for the Flying Returns program, 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 mandatory information we directly collect about you to provide the services booked by you is as follows:
  - Name;
  - Contact information, namely, address, phone number and e-mail address;
  - Flying Returns number and security information (if you are a registered member of Air India Flying Returns program or Star Alliance program);
  - Gender and date of birth;
  - Payment information (namely, debt or credit card information, card number, name of cardholder, billing address and expiry date);
  - Passport information and photograph (in case of international travel);
  - User and activity data from our sites and applications;
2. The other information we collect about you, when you voluntarily opt to provide the same while booking services with Air India, includes:
  - Government ID;
  - Corporate ID or promo code;
  - Images;
  - Travel information, preferences and special requests (namely, flight information, dietary, seating or other service preferences, upgrades, baggage requirements, lost luggage);
  - Purchase information (including both travel and non-travel purchases);
  - Health information (namely, medical records or requests);

- Survey responses;
- Tax identification number of promotion or survey winner, depending on the value of the prize.

### 3. Source of information

We collect your information from the following sources:

- **Online purchases:** When you book, purchase or enquire for services at Air India-managed websites, mobile sites and mobile applications.
- **Offline purchases:** When you book, purchase or enquire for Air India services at Air India ticketing offices, Customer Contact Centres or through authorised agents or other affiliates of Air India. To make a purchase or transact other business with Air India Customer Contact Centre, travel agents (including online travel agents outside of Air India), 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. The Reservation Agents are not directly under the control of Air India until you book Air India services with them.
- **Frequent Flyer Program:** When you book, purchase or enquire for Air India services using Air India Frequent Flyer Program membership or any other loyalty membership obtained from Air India or its affiliates. When you enroll in Air India Flying Returns Program, or if you are already a Flying Returns member, we collect specific information, namely, your name, address, phone number(s), email address, Flying Returns account number password and other account security authentication information. If you create a traveller profile, we also will collect the information that you choose to provide to us, which may include but not be limited to: payment information (namely, debit or credit card information, billing name and address), telephone numbers, email addresses, general requests or special needs, travel preferences and loyalty program information.
- **Medical or other emergency:** If a medical or other emergency occurs while travelling with Air India, 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.
- **Information we collect through our mobile application(s) (through cookies, beacons or other tracking technologies designed for mobile applications):** These include

- 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;
  - Transaction details and history.
- **Third-party analytics:** We also use automated devices and applications, such as Google Analytics, 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 your information**

1. 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.

## **CHAPTER-V**

### **Disclosure of your information to other parties**

1. Air India may disclose your information to the following persons/entities:
  - Air India's overseas offices and agents;

- Air India’s affiliates including airline partners, code share flights and ground handling staff;
  - Any governmental, regulatory and/or law enforcement authorities as directed by or required under applicable law, court order, subpoena or other legal process;
2. Your information may be disclosed by us for all or any of the following purposes:
- to conduct our operations and business and to provide you the services;
  - to comply with any applicable law, order, rule, regulation, direction or request of any governmental, regulatory or law enforcement authority in any jurisdiction;
  - to enforce or protect our rights or properties or any or all of our affiliates, associates, employees, directors or officers or when we have reason to believe that disclosing your information) is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities;
  - for such other purposes for which you have given your specific request or consent.
  - In accordance with Article L 237 -7 of French Homeland Security Code, please be informed that Air India may transmit reservation, checking and boarding data collected from their passengers ( API/PNR) to the French national public services and competent authorities for the purposes and under conditions as defined in the Decret N° 2014-1095 dated 26/09/2014, modified by decree 2018/714 dated August 3rd 2018

## **CHAPTER - VI**

### **Use of cookies, web beacons and other similar technologies**

1. Air India 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.
- Cookie.** "Cookies" are 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. Cookies and the other technologies discussed in this section allow us to recognize your preference information, to track your transactions and to facilitate effective website administration.
2. 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 are a registered user on our website and you elect to have the

website store your Flying Returns number, the cookie stored on your computer will contain your Flying Returns number.

3. 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.
4. ***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.

## **CHAPTER - VII**

### **Your control over your information**

1. Air India may, upon your written request to us, allow you to view, change or update your stored personal information. Where permitted by law, Air India reserves the right to charge a reasonable administrative fee for this service. In exceptional circumstances, Air India 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 Air India complying with a customer's request,
  - The information may, in the exercise of Air India'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.
2. If you are a Flying Returns member, you can view or update your personal information by logging into your Flying Returns membership account on Air India Flying Returns website. You may also update information relevant to your use of our mobile application(s) through the app itself.
3. To protect your privacy and Air India's proprietary databases and systems, you should not share any of your information, such as Flying Returns number or password, with any unauthorized individuals or third-party information aggregators that would allow them access to your sensitive account information. You should also take all necessary steps to secure your mobile devices and protect information you may have stored on them. We do not have control over the security of your mobile device. Air India 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 Air India 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, not Air India.

4. **Opting out:** Flying Returns members can opt out of receiving marketing or promotion-related emails or direct mail from Air India by accessing their account profile information on the Air India website and changing their profile to indicate their desire to be excluded. Emails sent to members will contain a message and link on how to opt out of that type of communication in the future. Regardless of your opt-out preferences, we reserve the right to send you emails or other communications for administrative purposes.

## **CHAPTER - VIII**

### **Minors**

1. Due to the nature of our services, Air India will collect and maintain travel information, about minor (according to applicable laws) when necessary to comply with security regulations, for safety reasons, or as otherwise necessary for Air India to provide transportation or other services requested.
2. Air India cannot distinguish the age of persons who access and use its websites. If a minor (according to applicable laws) has provided Air India with Customer data without parental or guardian consent, the parent or guardian should contact Air India to remove the relevant Customer data and unsubscribe the minor.

## **CHAPTER - IX**

### **Protecting information collected**

1. Air India maintains necessary safeguards to protect the customer information and do not engage in the business of buying or selling the customer data to any third party. Air India treats the information of its customers as proprietary and confidential and exercise same degree of care to protect the confidentiality of such information as it would exercise to protect its own confidential information, but in no case less than a reasonable degree of care.
2. Air India do 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 do 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 Air India, or where the personal data of any customer is manifestly public data.



## **CHAPTER - X**

### **Disclaimer**

1. In no event will Air India 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 Air India services.
2. Air India 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 Air India in accordance with this Policy or as mandated by applicable law.

## **CHAPTER – XI**

### **Miscellaneous**

#### **1. Location of your information / Data transfer**

Air India 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.

#### **2. Retention**

Air India will retain your information for as long as it is necessary to fulfill the purpose for which it was collected, the legal or business purposes of Air India, or as required by relevant laws. 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.

#### **3. 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. We are not responsible for the information practices of such third party sites.

#### **4. Contact us**

If you have comments or questions about this Policy, please submit your inquiry to Air India Customer Care. Please reference this Policy in those communications.

#### **5. 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 Air

India's intended business practices. By using any Air India digital channel, and/or by providing any information to Air India online or offline, you consent to the collection and use of such information by Air India, its affiliates, partners, contractors and permitted agents as herein described and consistent with applicable laws. Also, Air India, 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 May 25, 2018 This Privacy Policy supersedes previous privacy policies posted on Air India 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.